

May 18, 2012

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17120

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MAY 18 2012

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Revised 1st Quarter 2012 Reliability Report – West Penn Power Company – Pursuant to
52 Pa. Code § 57.195(d) and (e)

2-00030161

Dear Secretary Chiavetta:

Enclosed for filing on behalf of West Penn Power Company (“Company”) are an original and seven (7) copies of its revised 1st Quarter 2012 Reliability Report (“Report”) pursuant to 52 Pa. Code § 57.195(d) and (e). Please date-stamp the additional copy and return it in the enclosed postage-paid, addressed envelope for the Company’s file.

The Company stated in its May 1, 2012 quarterly report filing that the 1st Quarter 2012 Transmission and Distribution Operation and Maintenance Expenditure data would be filed with the Commission separately when it became available. For the Commission’s convenience, the Company is providing a copy of the page that has been updated, as well as copies of the revised report in its entirety.

Please feel free to contact either of us if you have any questions or need additional information regarding this matter.

Sincerely,



Douglas S. Elliott
President, Pennsylvania Operations
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Director, Operations Services
(330) 384-5970
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Section 57.195(e)(7): Quarterly and year-to-date information on budgeted versus actual transmission and distribution operation and maintenance expenditures in total and detailed by the EDC's own functional account code or FERC account code as available. (For first, second and third quarter reports only).

Budgeted vs. Actual T&D Operation & Maintenance Expenditures³

T&D O&M - 1Q / YTD March 2012					
FERC	1Q Actuals	1Q Budget	YTD Actuals	YTD Budget	Annual Budget
Operation Supervision and Engineering	(70,659)	(70,659)	(70,659)	(70,659)	(70,659)
Load Dispatching	445,934	445,934	445,934	445,934	6,950,594
Station Expenses	24,305	24,305	24,305	24,305	2,301,818
Overhead Lines Expenses	102,779	102,779	102,779	102,779	102,779
Transmission of Electricity by Others	5,916,116	5,916,116	5,916,116	5,916,116	17,730,188
Miscellaneous Transmission Expenses	21,814	21,814	21,814	21,814	136,868
Rents	-	-	-	-	-
Maintenance Supervision and Engineering	116,749	116,749	116,749	116,749	1,088,963
Maintenance of Structures	10,273	10,273	10,273	10,273	110,421
Maintenance of Station Equipment	342,298	342,298	342,298	342,298	415,701
Maintenance of Overhead Lines	286,289	286,289	286,289	286,289	3,527,269
Maintenance of Miscellaneous Transmission Plant	-	-	-	-	-
Market Administration, Monitoring & Compliance Services	44,308	44,308	44,308	44,308	44,308
Operation Supervision and Engineering	487,931	487,931	487,931	487,931	643,882
Load Dispatching	530,195	530,195	530,195	530,195	2,279,657
Station Expenses	41,047	41,047	41,047	41,047	733,217
Overhead Line Expenses	105,849	105,849	105,849	105,849	575,123
Underground Line Expenses	268,647	268,647	268,647	268,647	1,200,687
Meter Expenses	197,564	197,564	197,564	197,564	581,429
Customer Installations Expenses	108,604	108,604	108,604	108,604	108,604
Miscellaneous Dx Expenses	1,006,708	1,006,708	1,006,708	1,006,708	6,887,560
Rents	2,713	2,713	2,713	2,713	2,713
Maintenance Supervision and Engineering	584,710	584,710	584,710	584,710	906,276
Maintenance of Structures	-	-	-	-	-
Maintenance of Station Equipment	1,074,452	1,074,452	1,074,452	1,074,452	4,319,496
Maintenance of Overhead Lines	4,602,034	4,602,034	4,602,034	4,602,034	19,752,461
Maintenance of Underground Lines	57,351	57,351	57,351	57,351	667,349
Maintenance Line Transformer	48,027	48,027	48,027	48,027	48,027
Maintenance of Street Lighting and Signal Systems	59,158	59,158	59,158	59,158	396,513
Maintenance of Meters	222,122	222,122	222,122	222,122	1,362,485
Maintenance of Miscellaneous Distribution Plant	170,687	170,687	170,687	170,687	745,851
Total	16,808,005	16,808,005	16,808,005	16,808,005	73,549,580

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³ Budgets are subject to change.

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**REVISED 2012 1st Quarter Reliability
Report**

West Penn Power Company

Pursuant to 52 Pa. Code § 57.195(d) and (e)

1st Quarter 2012 Reliability Report - West Penn Power Company

The following 1st Quarter 2012 Reliability Report is filed on behalf of West Penn Power Company (“West Penn Power”) for the period ending March 31, 2012.

Section 57.195(e)(1): A description of each major event that occurred during the preceding quarter, including the time and duration of the event, the number of customers affected, the cause of the event and any modified procedures adopted in order to avoid or minimize the impact of similar events in the future.

Major Events

West Penn Power did not experience a major event during the reporting period ending March 31, 2012.

Section 57.195(e)(2): Rolling 12-month reliability index values (SAIFI, CAIDI, SAIDI, and if available MAIFI) for the EDC's service territory for the preceding quarter. The report shall include the data used in calculating the indices, namely the average number of customers served, the number of sustained customer interruptions, the number of customers affected, and the customer minutes of interruption. If MAIFI values are provided, the report shall also include the number of customer momentary interruptions.

Reliability Index Values

West Penn Power			
1Q 2012 (12-Mo Rolling)	Benchmark	12-Month Standard	12-Month Actual
SAIFI	1.05	1.26	1.30 ¹
CAIDI	170	204	146
SAIDI	179	257	190
Customers Served²	714,723		
Number of Sustained Interruptions	9,772		
Customers Affected	931,803		
Customer Minutes	136,043,482		

¹ The higher than normal SAIFI is directly attributed to several non-excludable storm events.

² Represents the average number of customers served during the reporting period.

Section 57.195(e)(3): Rolling 12-month reliability index values (SAIFI, CAIDI, SAIDI, and if available, MAIFI) and other pertinent information such as customers served, number of interruptions, customer minutes interrupted, number of lockouts, and so forth, for the worst performing 5% of the circuits in the system. An explanation of how the EDC defines its worst performing circuits shall be included.

Worst Performing Circuits – Reliability Indices

In 2012, the Company changed its worst performing circuit methodology. The new method now takes into account the number of customer outages on a circuit and the customer minutes on the circuit. This allows the method to be more stable and more accurately describe circuit performance.

The methodology used to identify worst performing circuits is based on both System Average Interruption Frequency Index (“SAIFI”) and System Average Interruption Duration Index (“SAIDI”). The methodology consists of the following steps:

1. For each circuit calculate a circuit SAIFI using only distribution-caused outages.
2. Select the worst 20% of circuits based on the highest circuit SAIFI.
3. Rank the selected circuits based on SAIDI using only distribution-caused customer minutes.
4. Select 5% of the circuits based on the highest customer minutes. These circuits are then identified as the worst performing circuits.

West Penn Power’s ranking of the 5% Worst Performing Circuits are provided in Attachment A to this report.

Section 57.195(e)(4): *Specific remedial efforts taken and planned for the worst performing 5% of the circuits identified in paragraph (3).*

Worst Performing Circuits – Remedial Action

West Penn Power's Remedial Actions for its 5% Worst Performing Circuits are provided in Attachment B to this report.

Section 57.195(e)(5): A rolling 12-month breakdown and analysis of outage causes during the preceding quarter, including the number and percentage of service outages, the number of customers interrupted, and customer interruption minutes categorized by outage cause such as equipment failure, animal contact, tree related, and so forth. Proposed solutions to identified service problems shall be reported.

Outages by Cause

Outages by Cause – West Penn Power

Outages by Cause				
1st Quarter 2012 12-Month Rolling	West Penn Power			
Cause	Customer Minutes	Number of Sustained Interruptions	Customers Affected	% Based on Number of Outages
EQUIPMENT FAILURE	20,803,434	2,514	170,183	25.73%
TREES/NOT PREVENTABLE	38,599,795	2,179	224,191	22.30%
UNKNOWN	10,906,781	1,239	88,045	12.68%
ANIMAL	3,778,125	938	32,293	9.60%
LINE FAILURE	9,677,146	652	65,341	6.67%
LIGHTNING	10,362,230	565	91,961	5.78%
TREES/PREVENTABLE	14,254,748	543	70,010	5.56%
WIND	14,985,520	538	65,883	5.51%
VEHICLE	9,539,587	352	88,741	3.60%
HUMAN ERROR NON-COMPANY	935,290	74	11,121	0.76%
OBJECT CONTACT WITH LINE	573,701	61	4,962	0.62%
UG DIG-UP	188,903	41	1,563	0.42%
OVERLOAD	420,842	38	3,706	0.39%
FIRE	850,974	30	8,583	0.31%
SWITCHING ERROR	159,749	4	5,048	0.04%
VANDALISM	6,657	4	172	0.04%
TOTAL	136,043,482	9,772	931,803	100.00%

Proposed Solutions – West Penn Power

Equipment Failure

West Penn Power maintains a Reliability Improvement Program (“RIP”) to help address poor performing distribution circuits. Many of the Ensure Reliability Service (“ERS”) programs, such as pole inspection, vegetation maintenance, etc., are performed on a scheduled basis. RIP provides a way to address circuit reliability problems outside of these scheduled maintenance activities.

The RIP teams conduct a detailed review of the poorest performing circuits and, if necessary, an improvement plan is developed. In addition to the poor performing circuits, the RIP teams also investigate any circuit which has been interrupted multiple times in the prior twelve month period and corrective action is planned as necessary. To focus on isolated problems, the RIP teams also investigate any sectionalizing device (line fuse or recloser) that has operated multiple times in a twelve month period and corrective action is planned as necessary.

Trees/Not Preventable

West Penn Power’s Danger Tree Program consists of removing, or significantly reducing in height, diseased or damaged trees located outside the boundary of the right-of-way (off ROW) that pose a threat to service reliability or the integrity of the line under any weather condition. West Penn Power also began targeting live, healthy trees that pose a threat to service reliability or integrity of the line by uprooting, breaking, or otherwise falling into the line.

Unknown

There are numerous events, which are typically transient in nature, that result in outages with the cause, “Unknown.” Procedures are in place for field personnel to investigate recurring outages on a specific sectionalizing device. Experience has shown that very few of the outage events classified as “Unknown” are recurrent in nature. West Penn Power has also introduced a root cause analysis process for all circuit lockouts that includes field patrols of all questionable outage causes.

Section 57.195(e)(6): Quarterly and year-to-date information on progress toward meeting transmission and distribution inspection and maintenance goals/objectives (for first, second and third quarter reports only).

T&D Inspection and Maintenance Programs

Inspection and Maintenance 2012		West Penn Power		
		Planned	Completed	
		Annual	1Q	YTD
Forestry	Transmission (Miles)	318.10	6.17	6.17
	Distribution (Miles)	4,533	1,251	1,251
Transmission	Aerial Patrols	2	0	0
	Groundline	206	0	0
Substation	General Inspections	5,050	1,515	1,515
	Transformers	405	173	173
	Breakers	210	92	92
	Relay Schemes	140	58	58
Distribution	Capacitors	1,360	144	144
	Poles	42,180	38,716	38,716
	Reclosers	3,556	52	52
	Radio-Controlled Switches	West Penn Power has no radio-controlled switches.		

Section 57.195(e)(7): Quarterly and year-to-date information on budgeted versus actual transmission and distribution operation and maintenance expenditures in total and detailed by the EDC's own functional account code or FERC account code as available. (For first, second and third quarter reports only).

Budgeted vs. Actual T&D Operation & Maintenance Expenditures³

T&D O&M 1Q /YTD March 2012					
FERC	1Q Actuals	1Q Budget	YTD Actuals	YTD Budget	Annual Budget
Operation Supervision and Engineering	(70,659)	(70,659)	(70,659)	(70,659)	(70,659)
Load Dispatching	445,934	445,934	445,934	445,934	6,950,594
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Rents	-	-	-	-	-
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Maintenance of Structures	10,273	10,273	10,273	10,273	110,421
Maintenance of Station Equipment	342,298	342,298	342,298	342,298	415,701
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Maintenance of Structures	-	-	-	-	-
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Maintenance of Miscellaneous Distribution Plant	170,687	170,687	170,687	170,687	745,851
Total	16,808,005	16,808,005	16,808,005	16,808,005	73,549,580

³ Budgets are subject to change.

Section 57.195(e)(8): Quarterly and year-to-date information on budgeted versus actual transmission and distribution capital expenditures in total and detailed by the EDC's own functional account code or FERC account code as available. (For first, second and third quarter reports only).

Budgeted vs. Actual T&D Capital Expenditures³

T&D Capital - 1Q / YTD March 2012					
Investment Reason	1Q Actuals	1Q Budget	YTD Actuals	YTD Budget	Annual Budget
Capacity	985,137	985,137	985,137	985,137	4,154,480
Condition	446,816	446,816	446,816	446,816	8,836,187
Facilities	2,815,486	2,815,486	2,815,486	2,815,486	5,401,834
Forced	4,682,417	4,682,417	4,682,417	4,682,417	30,209,021
Meter Related	(561,671)	(561,671)	(561,671)	(561,671)	2,011,450
New Business	4,017,844	4,017,844	4,017,844	4,017,844	17,244,298
Other	516,922	516,922	516,922	516,922	(2,594,517)
Reliability	1,589,873	1,589,873	1,589,873	1,589,873	10,509,227
Street Light	156,072	156,072	156,072	156,072	1,636,205
Tools & Equipment	256,348	256,348	256,348	256,348	2,976,949
Vegetation Management	6,058,959	6,058,959	6,058,959	6,058,959	31,981,095
Total	20,964,204	20,964,204	20,964,204	20,964,204	112,366,229

³ Budgets are subject to change.

Section 57.195(e)(9): Dedicated staffing levels for transmission and distribution operation and maintenance at the end of the quarter, in total and by specific category (for example, linemen, technician, and electrician).

Staffing Levels

West Penn Power 2012					
Department	Staff	1Q	2Q	3Q	4Q
Line	Leader / Chief	82			
	Lineman	170			
Substation	Leader	14			
	Electrician	46			
	Total	312			

Section 57.195(e)(10): Quarterly and year-to-date information on contractor hours and dollars for transmission and distribution operation and maintenance.

Contractor Expenditures

Contractor expenses are billed on a lump sum basis and as such, hourly information is not available.

Contractor Expenditures 2012 (\$)					
	1Q	2Q	3Q	4Q	Total
West Penn Power	1,483,675				

Section 57.195(e)(11): Monthly call-out acceptance rate for transmission and distribution maintenance workers presented in terms of both the percentage of accepted calls-out and the amount of time it takes the EDC to obtain the necessary personnel. A brief description of the EDC's call-out procedure should be included when appropriate.

Call-out Acceptance Rate

Call-out percentage is defined as the number of positive responses to total calls.

Call-out Acceptance Rate - 2012	
	West Penn Power
January	38%
February	45%
March	29%

Call-out Acceptance Rate

Larger utilities report the amount of time it takes to obtain the necessary personnel during call-outs. West Penn Power has worked with other utilities to ensure consistency in calculating and reporting this data.

West Penn Power					
2012	Total Call-Outs	Workers Accepting	Elapsed Time (Minutes)	Average Response Time per Crew Call-Out (Minutes)	Average Response Rate Per Workers Accepting (Minutes)
January	910	734	3,397	5.35	4.63
February	438	463	1,326	3.45	2.86
March	572	483	1,835	4.26	3.80
1Q Total	1,920	1,680	6,558	4.35	3.76

Total Call-outs = Total number of incidents

Workers Accepting = Total number of employees accepting work offered

Elapsed Time = Time of day called minus time of day accepted (expressed in minutes)

Average Response Time Per Crew Call-Out = Elapsed Time divided by Total Call-Outs

Average Response Time Per Workers Accepting = Elapsed Time divided by Workers Accepting

ATTACHMENT A

Worst Performing Circuits - Reliability Indices

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West Penn Power									
Circuit Rank	Substation	Circuit Desc	Average Customers	Outages	Customer Minutes	Customers Affected	SAIDI	SAIFI	CAIDI
1	DRIFTWOOD	DRIFTWOOD	974	25	1,620,899	4,025	2,232.17	3.13	540.16
2	SILVERVILLE 138-12	HARRISON	1,182	32	1,109,277	4,118	938.47	3.48	269.37
3	BETHLEN	LAUGHLIN TOWN	1,098	37	1,030,487	2,959	938.51	2.69	348.26
4	KISKI VALLEY	KITTANNING RD	1,806	27	978,588	5,107	541.85	2.83	191.62
5	MT VIEW	HUMPHREY	1,315	29	969,335	7,541	737.14	5.73	128.54
6	ROBBINS	BRADDOCKS TRAIL	1,596	15	938,813	8,370	588.23	5.24	112.16
7	LUXOR	FORBES ROAD	1,210	20	862,597	8,345	712.89	6.9	103.37
8	MURRY CREST	SARDIS ROAD	1,471	33	832,575	8,420	565.99	5.72	98.88
9	ROBBINS	BALKAN	1,674	17	806,761	6,060	481.94	3.62	133.13
10	DUTCH FORK	CLAYSVILLE	1,594	68	774,920	3,172	486.15	1.99	244.3
11	SOUTH UNION	FAIRCHANCE	2,121	31	769,418	4,529	362.76	2.14	169.89
12	NECESSITY	OHIOPLYE	738	34	703,241	4,455	952.9	6.04	157.85
13	WATERVILLE	WATERVILLE	355	27	681,696	3,568	1,920.27	10.05	191.06
14	RUTAN	WINDRIDGE	1,188	56	664,139	4,393	559.04	3.7	151.18
15	PETERS	VENETIA	1,862	23	646,047	6,638	346.96	3.56	97.33
16	SOUTH UNION	RTE. 119 NORTH	2,007	21	641,868	4,874	319.81	2.43	131.69
17	SALTSBURG	SALTSBURG	1,421	34	618,472	3,354	435.24	2.36	184.4
18	SEWICKLEY	ADAMSBURG	1,499	18	601,859	7,567	401.51	5.05	79.54
19	MATEER	DIME RD	1,213	46	583,540	2,934	481.07	2.42	198.89
20	KRENDALE	PROSPECT	1,401	41	576,340	4,763	411.38	3.4	121
21	ETHEL SPRINGS	NEW DERRY	1,023	30	576,182	2,788	563.23	2.73	206.66
22	EASTGATE	WEST POINT	1,452	20	573,225	7,966	394.78	5.49	71.96
23	PETERS	BOXER	2,182	19	561,971	7,248	257.55	3.32	77.53
24	VANDERGRIFT	AIRPORT	604	24	558,364	1,612	924.44	2.67	346.38
25	BETHLEN	LAUREL VALLEY	1,414	46	534,554	2,779	378.04	1.97	192.35
26	WYCOFF	WATER STREET	1,210	19	522,115	5,395	431.5	4.46	96.78
27	SOUTH UNION	SOUTH UNIONTOWN	1,346	11	519,563	3,884	386.01	2.89	133.77
28	MATHER	JEFFERSON	1,376	37	514,973	7,241	572.39	2.28	108.77
29	RUTAN	BRISTORIA	1,206	55	511,834	2,908	424.41	2.41	176.01
30	WEST HILLS	PLAZA	554	15	507,756	1,745	916.53	3.15	290.98
31	WHITE VALLEY	CONGRUITY	1,744	32	507,406	3,204	290.94	1.84	158.37
32	THOMAS	THOMAS	1,253	28	481,690	3,798	384.43	3.03	126.83
33	RURAL VALLEY	NUMINE	1,420	23	468,781	3,070	330.13	2.16	152.7
34	FAWN	BULL CREEK	863	22	446,904	3,851	517.85	4.46	116.05
35	LUZERNE	WEST BROWNSVILLE	1,100	11	445,625	2,663	405.11	2.42	167.34
36	FAYETTEVILLE	BIKLE ROAD	1,148	48	2,112,792	2,380	1,840.41	2.07	887.73
37	BLUE RIDGE SUMMIT	SABILLASVILLE	967	45	1,541,079	2,250	1,593.67	2.33	684.92
38	FAYETTEVILLE	DUFFIELD	1,511	21	930,541	2,738	615.84	1.81	339.86
39	QUINCY	ANTHONY HIGHWAY	953	19	718,540	2,541	753.98	2.67	282.78
40	WARFORDSBURG	NEEDMORE	598	15	471,282	2,790	788.1	4.67	168.92
41	GUILFORD	NEW FRANKLIN	348	15	466,697	686	1,341.08	1.97	680.32

ATTACHMENT B

Worst Performing Circuits – Remedial Action

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West PennPower			
Rank	Substation	circuit	Remedial Action Planned or Taken
1	DRIFTWOOD	DRIFTWOOD	87% of circuit CMI was driven by trees. Circuit reviewed for main line hardware issues. Corrective work and cycle tree trimming were completed in 2011.
2	SILVERVILLE 138-12	HARRISON	38% of circuit CMI was driven by both trees and unknown cause. Circuit to be reviewed for main line hardware issues and main line tree trimming in 2012.
3	BETHLEN	LAUGHLIN TOWN	23% of circuit CMI was due to weather and 33% was due to OH conductor. Circuit to be reviewed for main line hardware issues in 2012. Cycle tree trimming was completed in 2011.
4	KISKI VALLEY	KITTANNING RD	92% of circuit CMI was driven by weather. Main line tree trimming was completed in 2011. Circuit to be reviewed for main line hardware issues and cycle tree trimming in 2012.
5	MT VIEW	HUMPHREY	32% of circuit CMI was due to trees while 24% was due to each weather and public/animals. Circuit to be reviewed for main line hardware issues and main line tree trimming in 2012.
6	ROBBINS	BRADDOCK'S TRAIL	58% of circuit CMI was due to trees. Circuit to be reviewed for main line hardware issues in 2012. Cycle tree trimming was completed in 2011.
7	LUXOR	FORBES ROAD	40% of circuit CMI was due to trees and 32% was due to public/animals. Circuit to be reviewed for main line hardware issues in 2012. Cycle tree trimming was completed in 2011.
8	MURRY CREST	SARDIS ROAD	90% of circuit CMI was driven by trees. Circuit reviewed for main line hardware issues in 2011. Corrective work and main line tree trimming completed in 2011. Cycle trimming to be done in 2012.
9	ROBBINS	BALKAN	86% of circuit CMI was due to trees. Circuit reviewed for main line hardware issues. Corrective work and tree trimming was completed in 2011.
10	DUTCH FORK	CLAYSVILLE	55% of circuit CMI was due to trees and 17% due to public/animals. Mainline tree trimming was completed in 2011. Circuit to be reviewed for main line hardware issues and cycle tree trimming in 2012.
11	SOUTH UNION	FAIRCHANCE	78% of circuit CMI was due to unknown causes. Circuit to be reviewed for main line hardware issues and main line tree trimming in 2012.
12	NECESSITY	OHIOPYLE	65% of circuit CMI was due to trees. Circuit to be reviewed for main line hardware issues and main line tree trimming in 2012.
13	WATERVILLE	WATERVILLE	62% of circuit CMI was due to trees. Circuit is fed from foreign utility and alternate supply options are limited. Isolating points and fault indicators added as part of CAIDI improvement program. Circuit reviewed for main line hardware issues. Corrective work completed. Circuit monitoring will be installed and mainline tree trimming in 2012.
14	RUTAN	WINDRIDGE	35% of circuit CMI was due to trees and 28% due to public/animals. Installed new substation and circuit to split Windridge circuit. Main line tree trimming was completed in 2011. Circuit to be reviewed for main line hardware issues in 2012.

West Penn Power			
Rank	Substation	circuit	Remedial Action Planned or Taken
15	PETERS	VENETIA	35% of circuit CMI was due to public/animals and 30% due to OH material. Cycle tree trimming was completed in 2011. Circuit to be reviewed for main line hardware issues in 2012.
16	SOUTH UNION	RTE 119 NORTH	85% of circuit CMI was driven by weather. Circuit to be reviewed for main line hardware issues and cycle tree trimming in 2012.
17	SALTSBURG	SALTSBURG	43% of circuit CMI was due to weather and 25% circuit CMI due to trees. Circuit reviewed for main line hardware issues, corrective work and cycle tree trimming was completed in 2011.
18	SEWICKLEY	ADAMSBURG	40% of circuit CMI was due to weather and 40% of circuit CMI due to unknown causes. Circuit reviewed for main line hardware issues. Corrective work and cycle tree trimming was completed in 2011.
19	MATEER	DIME RD	69% of circuit CMI was due to OH material and 20% due to trees. Main line tree trimming was completed in 2011. Circuit to be reviewed for main line hardware issues in 2012.
20	KRENDALE	PROSPECT	49% of circuit CMI due to trees and 31% due to weather. Cycle tree trimming was completed in 2011. Circuit to be reviewed for main line hardware issues in 2012.
21	ETHEL SPRINGS	NEW DERRY	80% of circuit CMI due to trees. Main line tree trimming completed in 2011. Circuit to be reviewed for main line hardware issues in 2012.
22	EASTGATE	WEST POINT	57% of circuit CMI due to trees and 21% due to weather. Main line tree trimming completed in 2011. Circuit to be reviewed for main line hardware issues in 2012.
23	PETERS	BOXER	60% of circuit CMI was driven by trees and 30% due to unknown cause. Circuit reviewed for main line hardware issues. Corrective work and cycle tree trimming was completed in 2011.
24	VANDERGRIFT	AIRPORT	73% of circuit CMI was due to weather and 17% due to trees. Circuit to be reviewed for main line hardware issues and main line tree trimming in 2012.
25	BETHLEN	LAUREL VALLEY	72% of circuit CMI due to trees. Main line tree trimming was completed in 2011. Circuit to be reviewed for main line hardware issues and cycle tree trimming in 2012.
26	WYCOFF	WATER STREET	41% of circuit CMI was due to public/animals and 35% due to weather. Circuit to be reviewed for main line hardware issues and main line tree trimming in 2012.
27	SOUTH UNION	SOUTH UNIONTOWN	70% of circuit CMI due to trees and 29% due to weather. Circuit reviewed for main line hardware issues. Corrective work was completed in 2011. Main line tree trimming to be completed in 2012.
28	MATHER	JEFFERSON	69% of circuit CMI was due to weather. Main line tree trimming was completed in 2011. Circuit reviewed for main line hardware issues and corrective work was completed in 2011. Cycle tree trimming to be done in 2012.
29	RUTAN	BRISTORIA	41% of circuit CMI due to substation equipment and 39% due to trees. Main line tree trimming was completed in 2011. Circuit reviewed for main line hardware issues and corrective work was completed in 2011. Cycle tree trimming to be completed in 2012.

West Penn Power			
Rank	Substation	circuit	Remedial Action Planned or Taken
30	WEST HILLS	PLAZA	37% of circuit CMI was due to trees and 31% due to OH equipment. Circuit to be reviewed for main line hardware issues and mainline tree trimming in 2012.
31	WHITE VALLEY	CONGRUITY	75% of circuit CMI due to trees. Circuit reviewed for main line hardware issues. Corrective work was completed in 2011. Mainline tree trimming to be completed in 2012.
32	THOMAS	THOMAS	46% of circuit CMI was due to public/animals and 22% due to OH material. Circuit reviewed for main line hardware issues and corrective work was completed in 2011. Mainline tree trimming to be completed in 2012.
33	RURAL VALLEY	NUMINE	67% of circuit CMI due to trees and 28% due to public/animals. Main line tree trimming was completed in 2011. Circuit to be reviewed for main line hardware issues in 2012.
34	FAWN	BULL CREEK	45% of circuit CMI was due to OH conductor and 31% due to trees. Circuit reviewed for main line hardware issues. Corrective work and cycle tree trimming was completed in 2011.
35	LUZERNE	WEST BROWNSVILLE	49% of circuit CMI was due to OH material and 31% due to trees. Circuit to be reviewed for main line hardware issues and main line tree trimming to be completed in 2012.
36	FAYETTEVILLE	BIKLE ROAD	The October 2011 snow storm accounted for 97% of CMI (including one substation circuit lockout). Circuit will be reviewed for main line hardware issues in 2012.
37	BLUE RIDGE SUMMIT	SABILLASVILLE	91% of circuit CMI was due to three storm events, including Hurricane Irene. Circuit to be reviewed for main line hardware issues in 2012.
38	FAYETTEVILLE	DUFFIELD	85% of circuit CMI was due to two storm events. One substation circuit lockout accounted for 13% of CMI. Circuit to be reviewed for main line hardware issues in 2012.
39	QUINCY	ANTHONY HIGHWAY	91% of circuit CMI was due to two storm events. One additional substation circuit lockout accounted for 5% of CMI. Circuit to be reviewed for main line hardware issues in 2012.
40	WARFORDSBURG	NEEDMORE	79% of circuit CMI was due to one storm event and 19% of CMI was due to one line recloser lockout. Replacement of cutout was completed in 2011. Tree trimming to be completed in 2012.
41	GUILFORD	NEW FRANKLIN	95% of circuit CMI was due to two storm events. Circuit to be reviewed for main line hardware issues in 2012.

ATTACHMENT C

West Penn Power's Compliance with Terms of the July 20, 2006
Reliability Settlement Petition

Item	Description	Compliance Status
2a.	<p>Allegheny Power will make adjustments to its vegetation maintenance practices to reduce its rights-of-way clearing cycle to no longer than four years from [2005] through 2008 and will use the four-year cycle results to test the effectiveness of this approach. Allegheny Power reserves the right to change the cycle length after 2008 (after discussing with the parties) if another method with the cycle of more than four years appears more effective at managing its rights of way. Allegheny power will also make adjustments to its existing program to allow more focus on off-right-of-way danger trees.</p>	Commitment completed.
2b.	<p>Allegheny Power will maintain its 12-year inspection cycle for distribution and subtransmission wood poles and overhead facilities in a manner consistent with standard industry practices. These inspections will include visual inspections of the pole, the materials and equipment contained thereon from the ground line to the top of the pole, hammer soundings, borings, excavation and treatment of pole. In addition, Allegheny Power will commit to performing amid-cycle visual inspection of the pole and any material and equipment contained thereon, from the ground line to the pole top, incorporating reliability performance and performance of the materials and equipment into the prioritization of performing the mid-cycle inspections.</p>	Commitment implemented.
2c.	<p>Allegheny Power has committed to undertake a line workforce study that is to determine how many line workers should be hired to proactively prepare for anticipated retirements, to determine the optimal locations for line workers, to determine appropriate work shifts to reduce overtime, and to increase the effectiveness of its operations. Allegheny Power agrees to also study its substation workforce with the goal of estimating future staffing needs, preparing for anticipated retirements, determining the optimal locations and work shifts, and increasing the effectiveness of operations. The line and substation workforce study will be provide to the active parties and Allegheny Power will meet with them to discuss the results of the study.</p>	Commitment completed.
3.	<p>Allegheny Power will provide the Parties copies of all reliability-related reports filed with the PUC under 52 Pa. Code § 57.195 and any additional documents that may be required under 52 Pa. Code § 57.194(h)(1). In addition, as part of its quarterly reliability reports, Allegheny Power will include a section reporting on its compliance with the terms of this settlement.</p>	Commitment completed.
4a. 1-3	<p>Allegheny Power will meet semi-annually with PREA/AEC and local cooperative staff to address reliability and other issues. Meetings will include the following topics:</p> <ol style="list-style-type: none"> 1) Discussion of most recent outages at PREA/AEC delivery points 2) Identification and mutual agreement of Delivery Points that serve critical services/customers (identified as those which directly affect public safety) 3) Discussion of performance on the five "worst performing" Delivery Points, including outage details and determination if corrective action is warranted and development of any appropriate corrective action plan to be completed in a reasonable period of time. 	Commitment implemented.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Revised 1st Quarter 2012 Reliability Report -
West Penn Power Company - Pursuant to 52
Pa. Code § 57.195(d) and (e)**

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by overnight United Parcel Service, as follows:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Office of the Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Steven Gray
Office of Small Business Advocate
Suite 1102 Commerce Building
300 North Second Street
Harrisburg, PA 17101

David J. Dulick
Pennsylvania Rural Electric Assn.
212 Locust Street, 2nd Floor
Harrisburg, PA 17101

Scott J. Rubin
Utility Workers Union of America
333 Oak Lane
Bloomsburg, PA 17815

Service by electronic mail, as follows:

Darren Gill
Bureau of Technical Utility Services
Pennsylvania Public Utility Commission
dgill@pa.gov

Yasmin Snowberger
Dan Searfoorce
Bureau of Technical Utility Services
Pennsylvania Public Utility Commission
ysnowberge@pa.gov
dsearfoorc@pa.gov

Dated: May 18, 2012

Original Signed:


Annette L. Lusty
FirstEnergy Service Company
76 S. Main Street
Akron, OH 44308
(330) 374-6543
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ANNETTE LUSTY
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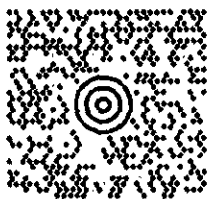
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SHIP TO:

ROSEMARY CHIAVETTA
111-111-1111

MAY 18 2012

PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE
400 NORTH STREET, 2ND FLOOR
HARRISBURG PA 17120



PA 171 9-20



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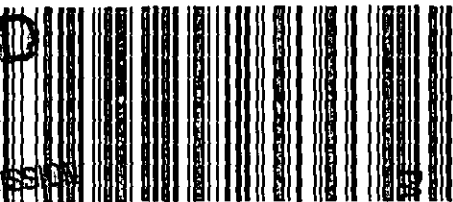
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**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



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